

November 23, 2015

Equipment Authorization Division
Office of Engineering and Technology
Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046

RE: LONG TERM CONFIDENTIALITY FOR INTERNAL PHOTOS

FCC ID: JFZRP32

To Whom It May Concern:

Per KDB 726920, we are submitting a Long Term Confidentiality request for the internal photos for our Studio Broadcast UWB wireless model number rp32.

We are asking that the Internal Photos required to be submitted with this application are to be permanently withheld from public review. Audio Technica has requested and received long term confidentiality for photos submitted in connection with certain prior generations of this equipment in the past and grant of long term confidentiality would not represent a departure from existing Commission policy.

Rather than a lumped element design, this product relies on a distributed element design; thus the actual selection, orientation and layout of circuitry and board components determines the tuning and proprietary performance. Someone skilled in the art may recognize/learn key design aspects. This request is made in order to ensure that our intellectual property, expertise and know-how do not become known or possessed by our competitors now or in the future. We will employ a number of measures to control the chain of custody and keep our intellectual property secure for this product:

The product will not be available via retail outlets. It will be sold directly to pre-qualified customers that have the correct (professional level) technical understanding, correct application requirement and setting, and that are entered into our SAP enterprise business software system for proper recording and tracking.

The product will be serialized and tracked in SAP enterprise business software system. Every serial number will be traceable to a specific qualified customer and installation.

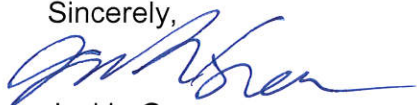
The product will be professionally installed and commissioned with direct input and oversight from Audio-Technica to maintain security.

The product will be labeled "Do not open. STATIC hazard. No user serviceable parts inside." The owner's manual will re-state the above warnings and add "STATIC HAZARD. Opening this unit is likely to cause permanent performance malfunction. Evidence of opening will void warranty. Serviceable only by Audio-Technica. Contact Audio-Technica for return authorization should service be necessary."

As noted in the warnings above, opening this unit without specific necessary precautions is highly likely to cause performance degradation and may render it inoperable. The devices contained within are highly static sensitive and can be damaged without being touched. Should corporate espionage take place, we then hope that the last resort of "seeing" our circuit and methods will be less useful since the performance will not be able to be examined or traced and understood.

We thank you for your consideration.

Sincerely,



Jackie Green
VP R&D/Engineering
Audio-Technica U.S., Inc.
1221 Commerce Drive
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